

1 E. MARTIN ESTRADA
 2 United States Attorney
 3 MACK E. JENKINS
 4 Assistant United States Attorney
 5 Chief, Criminal Division
 LYNDSI ALLSOP (Cal. Bar No. 323485)
 MARIA JHAI (Cal. Bar No. 283059)
 Assistant United States Attorneys
 Violent & Organized Crime Section
 1300 United States Courthouse
 312 North Spring Street
 Los Angeles, California 90012
 Telephone: (213) 894-3165/4138
 Facsimile: (213) 894-3713
 E-mail: lyndsi.all sop@usdoj.gov/maria.jhai@usdoj.gov



9 Attorneys for Plaintiff
 10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 ANDREW CLARK,
 17 aka "Mero güero,"
 aka "The Dictator,"
 aka "El manda mas,"
 aka "el chiquito loco,"
 aka "el niño problemático,"
 aka "The Dick,"
 aka "El Guapo,"
 aka "Mero Wero,"
 aka "Dick,"
 aka "Dictator,"
 aka "New Dict,"
 aka "DCY87D3T,"
 aka "U9BM5XPD,"
 aka "6YFRTV3P,"
 aka "8ZEDZR2D,"
 aka "J57629UV,"
 aka "ZFJJX7EF,"

CR 24-369 (A) -SPG - 2

GOVERNMENT'S NOTICE OF REQUEST FOR
DETENTION

25 Defendant.

26

27

28

1 Plaintiff, United States of America, by and through its counsel
2 of record, hereby requests detention of defendant and gives notice of
3 the following material factors:

4 1. Temporary 10-day Detention Requested (§ 3142(d)) on the
5 following grounds:

6 a. present offense committed while defendant was on release
7 pending (felony trial),

8 b. defendant is an alien not lawfully admitted for
9 permanent residence; and

10 c. defendant may flee; or

11 d. pose a danger to another or the community.

12 2. Pretrial Detention Requested (§ 3142(e)) because no
13 condition or combination of conditions will reasonably
14 assure:

15 a. the appearance of the defendant as required;

16 b. safety of any other person and the community.

17 3. Detention Requested Pending Supervised Release/Probation
18 Revocation Hearing (Rules 32.1(a)(6), 46(d), and 18 U.S.C.
19 § 3143(a)):

20 a. defendant cannot establish by clear and convincing
21 evidence that he/she will not pose a danger to any
22 other person or to the community;

23 b. defendant cannot establish by clear and convincing
24 evidence that he/she will not flee.

25 4. Presumptions Applicable to Pretrial Detention (18 U.S.C.
26 § 3142(e)):

27

- a. Title 21 or Maritime Drug Law Enforcement Act ("MDLEA") (46 U.S.C. App. 1901 et seq.) offense with 10-year or greater maximum penalty (presumption of danger to community and flight risk);
- b. offense under 18 U.S.C. §§ 924(c), 956(a), 2332b, or 2332b(g)(5)(B) with 10-year or greater maximum penalty (presumption of danger to community and flight risk);
- c. offense involving a minor victim under 18 U.S.C. §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1)-(a)(3), 2252A(a)(1)-2252A(a)(4), 2260, 2421, 2422, 2423 or 2425 (presumption of danger to community and flight risk);
- d. defendant currently charged with an offense described in paragraph 5a - 5e below, AND defendant was previously convicted of an offense described in paragraph 5a - 5e below (whether Federal or State/local), AND that previous offense was committed while defendant was on release pending trial, AND the current offense was committed within five years of conviction or release from prison on the above-described previous conviction (presumption of danger to community).

5. Government Is Entitled to Detention Hearing Under § 3142(f)

If the Case Involves:

a. a crime of violence (as defined in 18 U.S.C. § 3156(a)(4)), a violation of 18 U.S.C. § 1591, or Federal crime of terrorism (as defined in 18 U.S.C.

§ 2332b(g)(5)(B)) for which maximum sentence is 10 years' imprisonment or more;

- b. an offense for which maximum sentence is life imprisonment or death;
- c. Title 21 or MDLEA offense for which maximum sentence is 10 years' imprisonment or more;
- d. any felony if defendant has two or more convictions for a crime set forth in a-c above or for an offense under state or local law that would qualify under a, b, or c if federal jurisdiction were present, or a combination or such offenses;
- e. any felony not otherwise a crime of violence that involves a minor victim or the possession or use of a firearm or destructive device (as defined in 18 U.S.C. § 921), or any other dangerous weapon, or involves a failure to register under 18 U.S.C. § 2250;
- f. serious risk defendant will flee;
- g. serious risk defendant will (obstruct or attempt to obstruct justice) or (threaten, injure, or intimidate prospective witness or juror, or attempt to do so).

6. Government requests continuance of _____ days for detention hearing under § 3142(f) and based upon the following reason(s):

1 7. Good cause for continuance in excess of three days exists in
2 that:
3
4 _____
5 _____
6 _____
7 _____

8 Dated: September 17, 2024

Respectfully submitted,

9 E. MARTIN ESTRADA
10 United States Attorney

11 MACK E. JENKINS
12 Assistant United States Attorney
13 Chief, Criminal Division

14 
15 LYNDSSI ALLSOP
16 MARIA JHAI
17 Assistant United States Attorneys

18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA